

1 Q. And as you explained and I think you showed in a sort of
2 shortened fashion, each of these stand-alone cost figures -- so
3 NCR's \$350 million -- that's based on a projection that was made
4 with what you called a geostatistical model that you used that
03:06 5 depicted stand-alone remedies for each company, right?

6 A. Well, it has a number of components to the model.

7 Q. I'll just call it the model because it has a geostatistical
8 component and it has other components as well.

9 A. Correct.

03:06 10 Q. Okay. So the model projects a stand-alone remedy. You then
11 determine the cost of that stand-alone remedy, and that's what's
12 listed in this column, right?

13 A. Which column?

14 Q. In the stand-alone cost column. I'm sorry.

03:07 15 A. Yes.

16 Q. And let's project an exhibit from your deposition. It's
17 Exhibit 60 -- Trial Exhibit 6097.

18 And do you recall us working on this marked up version
19 of -- this is one of your stand-alone remedy maps from one of
03:07 20 your expert reports, isn't it?

21 A. Yes, it is.

22 Q. And it's got an exhibit sticker and it also -- do you
23 remember us drawing circles to depict particular areas that we
24 wanted to focus on in your deposition?

03:07 25 A. Yes, I do.

1 Q. And so we called the area near the Georgia-Pacific facility
2 up here Area 1 and the area near the U.S. Paper facility Area 2.

3 And I'd like to do something very similar to what we
4 did in your deposition and look at the stand-alone remedy
03:07 5 predictions that you generated for different companies and focus
6 on what that means in general for Area 1 and Area 2, okay?

7 A. Okay.

8 Q. Okay. So let's start with -- now, the maps that you
9 prepared like this change every so slightly from one report to
03:08 10 the other report here. So we're going to try to use the most
11 recent versions of your maps, which came from a supplemental
12 report that you did.

13 MR. STONE: Could you project Demonstrative
14 Exhibit 3056, please.

03:08 15 BY MR. STONE:

16 Q. And this is the latest supplemental report you prepared,
17 isn't it?

18 A. Yes.

19 Q. And that includes the latest versions of the standalone
03:08 20 remedy maps that you've prepared?

21 A. Yes.

22 Q. Thank you.

23 Let's start with Image 17. And we're starting with --
24 sort of working our way up to NCR. So this is your stand-alone
03:08 25 remedy map for the other PRPs using the Simon estimates, isn't

1 it?

2 A. Yes.

3 Q. And do you see where we've this time electronically drawn
4 Area 1 and Area 2? And I will represent to you that they will
03:09 5 be the same size, as best we can do with electronic technology,
6 and the same location on several versions of this map.

7 Under the other PRP stand-alone remedy is there
8 dredging required in Area 1?

9 A. Yes.

03:09 10 Q. And the dredging is shown, and it actually differs in
11 intensity on different maps, but there's -- you didn't intend
12 anything by the difference in intensity of colors. Brown
13 shading means dredging on all these maps, doesn't it?

14 A. Well --

03:09 15 Q. Should we go back out to the key?

16 MR. STONE: Let's go back out to the key.

17 THE WITNESS: Yes, it does.

18 BY MR. STONE:

19 Q. So for the collection of other PRPs is there dredging
03:09 20 required in Area 1?

21 A. There's some dredging in some areas and some areas have no
22 action.

23 Q. Correct. And when I asked you if there's dredging required
24 in the area, I'm not trying to get you to say that everything
03:10 25 within that oval is dredging. It's just a yes-or-no question.

1 Is there dredging, is there not dredging. Okay?

2 A. The quantities do matter.

3 Q. I agree. I agree. But is there dredging in Area 1 with the
4 other PRPs map?

03:10 5 A. Yes, there is.

6 Q. And also in Area 2 on the other PRPs map.

7 A. Yes, there is.

8 Q. And, in fact, on this one, if we would focus on Area 2,
9 there's a substantial amount of dredging on Area 2 on this map,
03:10 10 isn't there?

11 A. Yes, there is.

12 Q. Okay, thank you.

13 Let's go to Image 16. And I'll ask you the same
14 questions: This is for your modeled Menasha-only stand-alone
03:10 15 remedy, isn't it?

16 A. Yes, it is.

17 Q. And is there dredging in Area 1?

18 A. Yes, there's dredging in some of the area.

19 Q. And in Area 2 there's a substantial amount of dredging
03:10 20 projected by your model, isn't there?

21 A. Yes, there is.

22 Q. Okay. Let's go to Image 15.

23 This one's a little different. This is
24 Georgia-Pacific. So with Georgia-Pacific let's focus first on
03:11 25 Area 2.

1 MR. STONE: And if you could zoom in, Danny.

2 BY MR. STONE:

3 Q. There's no dredging for Georgia-Pacific in Area 2, is there?

4 A. That's right.

03:11 5 Q. And let's look at Area 1 now. And there's some dredging in
6 Area 1, isn't there?

7 A. There's some dredging, yes.

8 I just want to point out that these are
9 two-dimensional figures that we're looking at. There's a third
03:11 10 dimension, which is depth, and the depths vary from party to
11 party. And so what you're actually dredging is not just the
12 area but the depth. You're dredging the volume. So that's
13 where you get different quantities.

14 Q. That's a good point. And we'll get to that in a minute.

03:11 15 MR. STONE: Now let's project Image 14 of this
16 demonstrative exhibit.

17 BY MR. STONE:

18 Q. And this is for the Glatfelter stand-alone remedy. I'll
19 shortcut it. There's dredging in both Areas 1 and 2, isn't
03:12 20 there?

21 A. Yes, there is.

22 Q. And finally we get to the NCR stand-alone remedy. I think
23 it's Image 12. And there's a substantial amount of dredging in
24 both Areas 1 and Area 2, isn't there?

03:12 25 A. There's dredging in both 1 and 2, yes.

1 Q. Okay. And from comparing these, you would agree that not
2 only is there dredging in Areas 1 and Areas 2 -- Area 1 and
3 Area 2 -- well, let me stop and back up.

4 In Area 1 there's dredging for every stand-alone
03:12 5 remedy that you depicted in what we just looked at, right?

6 A. Say that again.

7 Q. In Area 1 there is dredging in every stand-alone remedy map
8 that we've looked at, right?

9 A. In Area 1 but the scale difference in each one.

03:12 10 Q. Correct. But there's overlap, isn't there?

11 A. There's some overlap, yes.

12 Q. There is some overlap. And there's some overlap in Area 2
13 for every one of the PRPs or PRP groups, every one of the
14 stand-alone remedies other than Georgia-Pacific, right?

03:13 15 A. Correct.

16 Q. I want to go to a point you just made, which is --

17 MR. STONE: Let's project Exhibit 5084B, please. And
18 could we zoom in to begin with just on the -- like the first --
19 however many rows to the dark black line there. Including
03:13 20 the -- yeah, that's perfect.

21 BY MR. STONE:

22 Q. So this is the data you were describing from what's called
23 the core chemistry database?

24 A. Yes.

03:13 25 Q. And I guess I'll take one point first. Mr. Chesler asked